

William Bernarduci (WB 5785)
SCHATZ & NOBEL, P.C.
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LYDIA GARCIA, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

-----X

-----X
QUANTUM EQUITIES L.L.C., individually :
and on behalf of all others similarly :
situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

-----X

Case No. 04-CV-8807-KMK

**NOTICE OF MOTION OF
ALLAN SCHRAGER FOR
APPOINTMENT OF LEAD PLAINTIFF
AND APPROVAL OF COUNSEL**

Case No. 04-CV-8877-KMK

-----X
JAMES T. KAHN, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-8910-KMK

-----X

-----X
JONCO INVESTORS, LLC, individually :
and on behalf of all others similarly :
situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-9021-KMK

-----X

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JAMES IRVINE, individually and on	:	
behalf of all others similarly situated,	:	Case No. 04-CV-9078-KMK
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
	:	
JAKKS PACIFIC, INC., JACK	:	
FRIEDMAN, STEPHEN G. BERMAN,	:	
and JOEL M. BENNETT,	:	
	:	
Defendants.	:	
-----X		

PLEASE TAKE NOTICE that on the Declaration of William Bernarduci dated January 4, 2005, and the exhibits thereto, and on the accompanying memorandum of law, proposed Lead Plaintiff Allan Schrager will move this Court at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, Courtroom 21D on January 25, 2005 for an order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), (i) appointing Mr. Schrager as a Lead Plaintiff in this action on behalf of investors who purchased or otherwise acquired the publicly traded securities of JAKKS Pacific, Inc. during the relevant class period (the “Class”) and (ii) approving Mr. Schrager’s selection of Schatz & Nobel, P.C. as Lead Counsel.

Dated: January 4, 2005

Respectfully submitted,

SCHATZ & NOBEL, P.C.

By: /s/ William Bernarduci
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